

Brian A. Paino (SBN 251243)
bpaino@hinshawlaw.com
David T. Hayek (SBN 144116)
dhayek@hinshawlaw.com
Zeeshan Iqbal (SBN 337990)
ziqbal@hinshawlaw.com
HINSHAW & CULBERTSON LLP
350 South Grand Ave., Suite 3600
Los Angeles, CA 90071-3476
Telephone: 213-680-2800
Facsimile: 213-614-7399

Attorneys for *Defendants* **MOISHE GUBIN, OPTIMUMBANK HOLDINGS, INC.,
OPTIMUMBANK, and OPTIMUMBANK.COM**

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP, P.C.,

Debtor.

RICHARD A. MARSHACK, Trustee of the LPG
Liquidation Trust,

Plaintiff,

v.

WORLD GLOBAL FUND, LLC, *et al.*,

Defendants.

Case No.: 8:23-bk-10571-SC

Chapter 11

Adv. Case No.: 8:25-ap-01105-SC

**STIPULATION TO EXTEND DEADLINE
FOR DEFENDANTS MOISHE GUBIN,
OPTIMUMBANK HOLDINGS, INC.,
OPTIMUMBANK, AND
OPTIMUMBANK.COM TO RESPOND TO
COMPLAINT**

Hearing: [No Hearing Required]

This *Stipulation to Extend Deadline for Defendants to Respond to Complaint* (the "Stipulation") is entered into by and between *plaintiff* Richard A. Marshack, Trustee of the LPG Liquidation Trust ("Plaintiff"), and *defendants* Moishe Gubin, OptimumBank Holdings, Inc., OptimumBank, and OptimumBank.com (collectively, the "Defendants"), by and through their undersigned counsel.

RECITALS

A. On March 10, 2025, Plaintiff initiated this action by filing a complaint (the "Complaint") against Defendants, among others. (*See* Doc. 1).

6 The Parties stipulate and agree as follows:

9 IT IS SO STIPULATED.

Attorneys for *Plaintiff* **RICHARD A. MARSHACK,**
TRUSTEE OF THE LPG LIQUIDATION TRUST

Attorneys for *Defendants* **MOISHE GUBIN,
OPTIMUMBANK HOLDINGS, INC.,
OPTIMUMBANK, and OPTIMUMBANK.COM**

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

HINSHAW & CULBERTSON, LLP 350 S. Grand Avenue, Suite 3600, Los Angeles, CA 90071-3476

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS MOISHE GUBIN, OPTIMUMBANK HOLDINGS, INC., OPTIMUMBANK, AND OPTIMUMBANK.COM TO RESPOND TO COMPLAINT**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 04/16/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Brian A Paino** bpaino@hinshawlaw.com; hmosothoane@hinshawlaw.com; crico@hishawlaw.com
- **Christopher Ghio** Christopher.Ghio@dinsmore.com; angelica.urena@dinsmore.com
- **Karen Hockstad** karen.hockstad@dinsmore.com; kim.beavin@dinsmore.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com; ecf.alert+Marshack@titlexi.com
- **Victoria Newmark** vnewmark@pszjlaw.com; hdaniels@pszjlaw.com; bdassa@pszjlaw.com; hwinograd@pszjlaw.com
- **Matthew Sommer** matthew.sommer@dinsmore.com; carrie.davis@dinsmore.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

04/16/2025

Date

Carolina Rico

Printed Name

/s/ Carolina Rico

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.